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April 9, 2025

VIA ECF

Pamela K. Chen, U.S.D.J.
United States District Court, Eastern District of New York
225 Cadman Plaza East, Courtroom 4F North
Brooklyn, New York 11201-1804

Re: *IME Watchdog, Inc. v. Gelardi, et al.*
Case No.: 1:22-cv-1032 (PKC)(JRC)

Dear Judge Chen:

We represent defendants Safa Gelardi, Vito Gelardi and IME Companions LLC and write in opposition to plaintiff's request for a pre-motion conference. In light of the Court's comments at the hearing held on April 2, 2025, defendants believe that plaintiff's request for a pre-motion conference to move for "case-ending sanctions" and summary judgment is moot.

In any event, plaintiff has yet to be deposed and is seeking leave to amend, meaning that any dispositive motion would be pre-mature at this time.

Respectfully,

/s/ Jonathon D. Warner

JDW/ks

cc: All counsel (via ECF)